

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DOLLS KILL, INC.,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,

Defendants.

Case No. 1:24-cv-01960

Hon. Steven C. Seeger

TEMPORARY RESTRAINING ORDER

Plaintiff DOLLS KILL, INC. (“DOLLS KILL”) filed an *Ex Parte* Motion for Entry of a Temporary Restraining Order, including a temporary injunction, alternative service, a temporary asset restraint and expedited discovery (the “Motion”) against the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (collectively, “Defendants”) and the online marketplace accounts identified in Schedule A (the “Online Marketplaces”). After reviewing the Motion and the accompanying record, this Court GRANTS DOLLS KILL’s Motion in part as follows.

This Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendants because Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, DOLLS KILL has provided a basis to conclude that Defendants have targeted sales and advertisements to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more seller aliases, offer shipping to the United States, including Illinois, and have advertised and sold products using infringing and counterfeit versions of DOLLS KILL’s federally registered Copyrights (the

¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces

“DOLLS KILL Copyrights”) to residents of Illinois. In this case, DOLLS KILL has presented screenshot evidence that each Defendant e-commerce store is reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which Illinois residents can and do purchase products using counterfeit versions of the DOLLS KILL Copyrights. See Docket No. 2, which includes screenshot evidence confirming that each Defendant internet store does stand ready, willing and able to ship its counterfeit goods to customers in Illinois bearing infringing and/or counterfeit versions of the DOLLS KILL Copyrights. A list of the DOLLS KILL Copyrights are included in the below chart.

REGISTRATION NUMBER	REGISTERED COPYRIGHTS	COPYRIGHT DEPOSIT
VA 2-288-041	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA 229-8765	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA 2-284-380	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA 236-3239	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA 230-1576	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA0002328494	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA0002303093	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA0002369408	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA0002359850	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir
VA0002377038	Dolls Kill, Inc.	See Dkt. 8, Decl. of Olfa B’Chir

This Court also finds that issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure is appropriate because DOLLS KILL has presented specific facts in the Declaration of Olfa B’Chir in support of the Motion and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order, Defendants could and likely would move any assets from accounts in financial institutions under this Court’s jurisdiction to off-shore accounts. Accordingly, this Court orders that:

1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting

for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:

- a. using the DOLLS KILL Copyrights or any reproductions, counterfeit copies, or colorable imitations in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine DOLLS KILL product or not authorized by DOLLS KILL to be sold in connection with the DOLLS KILL Copyrights;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine DOLLS KILL product or any other product produced by DOLLS KILL, that is not DOLLS KILL or not produced under the authorization, control, or supervision of DOLLS KILL and approved by DOLLS KILL for sale under the DOLLS KILL Copyrights;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control, or supervision of DOLLS KILL, or are sponsored by, approved by, or otherwise connected with DOLLS KILL; and
 - d. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for DOLLS KILL, nor authorized by DOLLS KILL to be sold or offered for sale, and which bear any of DOLLS KILL's Copyrights, including the DOLLS KILL Copyrights, or any reproductions, counterfeit copies, or colorable imitations.
2. DOLLS KILL is authorized to issue expedited written discovery to Defendants, pursuant to Federal Rules of Civil Procedure 33, 34, and 36, related to:

- a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and
 - c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Inc. ("PayPal"), Alipay, ContextLogic Inc. d/b/a Wish.com ("Wish.com"), Alibaba Group Holding Ltd. ("Alibaba"), Ant Financial Services Group ("Ant Financial"), Amazon Pay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
3. The Court authorizes Plaintiff to serve third-party discovery on an expedited basis, with responses due not less than 10 days after service. The requests shall be proportional to the immediate needs of the case. *See* Fed. R. Civ. P. 26(b)(1). For example, a request for "documents sufficient to show X" is better than a


request for “all documents showing X.” Plaintiff shall consider what documents it genuinely needs at this early stage, and shall take into account the burden on third parties. Plaintiff shall work cooperatively with third parties impacted by this Order and make reasonable, good faith efforts to ease the burdens imposed by Plaintiff’s request for expedited discovery. Upon DOLLS KILL’s request, those with notice of this Order, including the Third Party Providers as defined in Paragraph 5, shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the DOLLS KILL Copyrights.

4. DOLLS KILL may provide notice of the proceedings in this case to Defendants, including notice of the preliminary injunction hearing, service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order, and other relevant documents on a website and by sending an e-mail with a link to said website to the e-mail addresses identified in Exhibit B and D to the Complaint and any e-mail addresses provided for Defendants by third parties. The Clerk of the Court is directed to issue a single original summons in the name of “[FIRST DEFENDANT] and all other Defendants identified in the Complaint” that shall apply to all Defendants. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their

objections.

5. DOLLS KILL must provide notice to Defendants of any motion for preliminary injunction as required by Rule 65(a)(1).
6. Within seven (7) calendar days of entry of this Order, DOLLS KILL shall deposit with the Court \$15,000.00, either cash, business check, or surety bond, as security, which amount has, in the absence of adversarial testing, been deemed adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful restraint hereunder.
7. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and the Northern District of Illinois Local Rules. Any third party impacted by this Order may move for appropriate relief.
8. This Temporary Restraining Order without notice is entered at 5:00 p.m. on April 26, 2024 and shall remain in effect for fourteen (14) calendar days.

Date: April 26, 2024



Steven C. Seeger
United States District Judge

SCHEDULE A

<u>No.</u>	<u>Claims</u>	<u>Defendant Seller Alias</u>	<u>Seller ID</u>	<u>ASIN/Product Number</u>	<u>Platform</u>
1	SD	LZLRun (FangFei)	A2KM6PO6WPRZ69	B0B2P38DPJ B0B1PR1384 B09FYX4S3D B09FYWCY7Y B09FYWN1YK B09FYX2PZ4 B09FYVRLV2 B0953DC6GF B09FLFC3ZC B09X32M4PL B0B1PR1384 B0B4J6V3KQ B0B4P55DZW B09Z2T12LD B0953CZ5V5 B09M8C3YWY	Amazon
2	A	Purjarda	A1QC7KFMHF4JWQ	B098F94RKY	Amazon
3	SD	ARQA	AD1V1NYJTMDQD	B094XS24X9 B094XHDK6D B094XSQJF9 B08W3X1KYS B08W3W7G93 B08W3VRGHQ B08W3X1KYS B08W3TD7GT B08W3WK3XM B08W3TSVJ7 B08W3VT7MP B08W3SKCHF B08W3VKN6C B08W3WVRQK B094XTSNGX B094XRZTSL B094XSLK1G B094XQT1LC B094XTXTWM B094XSG9C6 B094XTL9B5 B094XSG21C B094XS24X9 B094XSJH2W	Amazon

				B094XSGTH7 B094XTRG3T B094XSQJF9 B094XTSHKV B094XQR21Q B094XTXTWQ B094XTVPW1 B094XV31SK B094XSN96R B094XTX6SP	
4	SD	Avalon Home	A2B4GYNMNWJ7F	B09XX5VL9M B0BQFR2YY8 B0BQFS7S6H B0BQFPBMQ2 B0BQFR65C8 B0BQFQQ4HB B0BQFRKDNR B0BQFQNYH7 B0BQFP8SZF B0BQFP8R58 B0BQFP5TBK B0BQFQLYZ5	Amazon

5	SD	喵啊呜 IMPREMEY	A2IJWKDR4FQ70B	B0CB5V7S71 B0C1JJLRH4 B0C1JHFY51 B0C1JLQRL3 B0C1JL4QLW B0C1JHX2DN B0C1JHX61P B0C1JJLMRV B0C1JHPYYY B0C1JJDR31 B0C1JKTLV4 B0C1JKXY8Z B0C1JK2HC6 B0C1JJR427 B0C1JKL2SV B0C1JK7W35 B0C1JHTKX3 B0C1JLNRG6 B0C1JGZGFN B0C1JJYC9Q B0C1JH6JRR B0C1JK63ZZ B0C1JJGWMZ B0C1JJK8D6 B0C1JKY21G B0C1JLVQDG B0C1JLTCBL B0C1JJT735 B0C1JHYMSY	Amazon
6	SD	Gogne Shoes	A1EVYC6O6VB30Y	B07MV4PZQT B07MTYJXYJ B07MV3Z921 B07MTYTX54	Amazon
7	SD	ohichiic	A1JW1HQ125E8W4	B09MW9LYMH B09MWB5CLJ B09MWBFBVGT B09MWB33K9 B09MWCJ4LF B09MWBGLLG B09MW9XG4L B09MWC5NTJ B09MWB2415	Amazon
8	A	Luolania	A3H9RESPJ89G37	B0BRXXD1H9	Amazon
9	A	Zhinanertui	A2OIP08XF97XN8	B0BRZTY612	Amazon

10	SD	MengEryt	A3G2JN8VLWLVD1	B07Q2R6H7L, B0998JC9NZ, B084ZQ2Y1M, B07Q2M93FN	Amazon
11	A	Galawaqe	A3KAJDGGIUEXDZ	B07Q2R6H7L B09M9Y8XR7 B0CN31N9DM B0CN31GM6F B09M9YY5YV B099D99C6V B0CN35DQG4 B0CN32W6B3 B0CN32CHLS B0CN342DWV	Amazon
12	A	Liuchaoxiaomai bu		B0BS6BJ2P8	Amazon
13	SD	Anxianhe- Brand Bangyeer		B0BSL6DS55	Amazon
14	A	Max Fashion Shop	A1WLLADPE53FJ9	B0CHMPX9S9 B0CLNT5FTG B0CHMPQZ31 B0CHMNZC2D B0CHMQYSL4 B0CHMPQTBY B0CHMPYFQV B0CHMPVN16 B0CHMRSH31 B0CHMPPQ92 B0CHMQHY62 B0CHMPQZ31 B0CHMPX9S9	Amazon
15	A	ThusFar	A26YHXEFKH9OBZ	B0CLC95SZM B0CJHKBSCY B0CJHQP71N B0CLC5CKXS B0CJHQP71N B0CJHJZTF9	Amazon